

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:

VON J. MILLER and SUSANNE B. MILLER,

Debtor(s).

VON J. MILLER and SUSANNE B. MILLER,

Plaintiff(s),

v.

BANK OF AMERICA, N.A. successor by
merger to Countrywide Bank, FSB; BAC
HOME LOANS SERVICING, LP.,

Defendants.

Case No. 10-10076

Chapter 13

Adversary Case No. 10-01333

DECLARATION BY COUNSEL IN
SUPPORT OF PLAINTIFFS'
MOTION FOR DEFAULT AND
DEFAULT JUDGMENT

I, Christina Latta Henry, declare as follows:

1. I am an attorney admitted to practice before this Court and the attorney
representing the Plaintiffs in this case. I have personal knowledge of the facts stated in this
Declaration and am competent to testify to them.

2. In accordance with F.R.B.P 7004, the Plaintiffs had the Summons and Complaint
served by Certified Mail the CEO for the Defendant Bank of America, NA ("BOA") Chief

DECLARATION BY COUNSEL IN SUPPORT OF
PLAINTIFFS' MOTION FOR DEFAULT AND DEFAULT
JUDGMENT

(□) - 1

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705 SECOND AVE., SUITE 1050
SEATTLE, WASHINGTON 98104
telephone (206) 324-6677

1 Executive Officer, 100 North Tryon Street, Charlotte, NC 28255 and for Defendant BAC Home
2 Loans Servicing, LP ("BAC") - Chief Executive Officer 7105 Corporate Drive, PTX-B-209,
3 Plano, TX 75024. An Affidavit of Service was filed with the Court via ECF on June 25, 2010.

4 3. More than twenty (30) days have passed since service of the Summons and
5 Complaint. To date, neither a Notice of Appearance nor an Answer has been filed with the Court
6 or submitted to Plaintiffs by the Defendant.

7 Under penalty of perjury, I declare I have read this statement and to the best of my
8 knowledge believe it is true and correct.
9

10 DATED this 2nd day of August, 2010.

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12 SEATTLE DEBT LAW, LLC

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14 /s/ Christina Latta Henry
15 Christina Latta Henry, WSBA 31273
16 Attorney for Plaintiffs
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